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*Counsel for Defendant Google LLC*

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, WILLIAM BYATT,  
JEREMY DAVIS, CHRISTOPHER  
CASTILLO, and MONIQUE TRUJILLO,  
individually and on behalf of themselves and  
all others similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**DECLARATION OF JONATHAN TSE IN  
SUPPORT OF GOOGLE LLC'S  
ADMINISTRATIVE MOTION TO SEAL  
PORTIONS OF GOOGLE LLC'S  
SUBMISSION IN RESPONSE TO DKT. 604**

Judge: Hon. Susan van Keulen, USMJ

1 I, Jonathan Tse, declare as follows:

2 1. I am a member of the bar of the State of California and an attorney at Quinn Emanuel  
3 Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC (“Google”) in this action. I make  
4 this declaration of my own personal, firsthand knowledge, and if called and sworn as a witness, I  
5 could and would testify competently thereto.

6 2. Pursuant to Civil Local Rule 79-5, I submit this declaration in support of Google  
7 LLC’s Administrative Motion to Seal portions of Google’s Submission in Response to Dkt. 604  
8 (“Google’s Submission”). In making this request, Google has carefully considered the relevant legal  
9 standard and policy considerations outlined in Civil Local Rule 79-5. Google makes this request  
10 with the good faith belief that the information sought to be sealed consists of Google’s confidential  
11 and proprietary information and that public disclosure could cause competitive harm.

12 3. The information requested to be sealed contains Google’s confidential and  
13 proprietary information regarding highly sensitive features of Google’s internal systems and  
14 operations, including internal details related to Google’s databases, logs, and encryption practices,  
15 and their proprietary functionalities, that Google maintains as confidential in the ordinary course of  
16 its business and is not generally known to the public or Google’s competitors.

17 4. Such confidential and proprietary information reveals Google’s internal strategies,  
18 system designs, and business practices for operating and maintaining many of its important services,  
19 and falls within the protected scope of the Protective Order entered in this action. *See* Dkt. 81 at 2-  
20 3.

21 5. Public disclosure of such confidential and proprietary information could affect  
22 Google’s competitive standing as competitors may alter their identifier system designs and practices  
23 relating to competing products. It may also place Google at an increased risk of cyber security  
24 threats, as third parties may seek to use the information to compromise Google’s data sources,  
25 including data logs, internal data structures and internal identifier systems.

26 6. For these reasons, Google respectfully requests that the Court order Google’s  
27 Submission to be filed under seal.  
28

1 I declare under penalty of perjury of the laws of the United States that the foregoing is true  
2 and correct. Executed in San Francisco, California on June 21, 2022.

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4 DATED: June 21, 2022

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

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6  
7 By /s/ Jonathan Tse

Jonathan Tse

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9 *Attorney for Defendant*  
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